NEW MEXICO
ENVIRONMENT DEPARTMENT

Harold Runnels Building
1190 Saint Francis Drive, PO Box 5469
Santa Fe, NM 87502-5469
Telephone (505) 827-2855
www.env.nm.gov

Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

Certified Mail – Return Receipt Requested

March 20, 2019

Dr. Jorge A. Garcia, Utilities Director
City of Las Cruces
Post Office Box 20000
Las Cruces, New Mexico 88004

Re: City of Las Cruces, East Mesa Water Reclamation Plant; Major; Individual Permit; SIC 4952; Compliance Evaluation Inspection; NPDES Permit NM0030872; February 14, 2019

Dear Dr. Garcia:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Further explanations and problems noted during this inspection are discussed on the completed form and checklist of this inspection report. Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

NPDES Enforcement Coordinator
Environmental Protection Agency, Region 6
NPDES Enforcement Branch (6EN-WM)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

David Long (Long.David@epa.gov) is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at 505-827-0596 or at Jennifer.foote@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

Cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Nancy Williams, USEPA (6EN-WC) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Brent Larsen, USEPA (6WQ-PP) by e-mail
Michael Kesler, NMED District III by e-mail
Jerry Flores, City of Las Cruces by email

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	12	yr/mo/day	17	18	Inspec. Type	19	Inspector	20	Fac Type
	N	5	NM0003087	2		190214			C		S		1

Remarks: MAJOR MUNICIPAL WWTP

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	74	75	Reserved	80
				4		N		N					

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
City of Las Cruces, East Mesa Water Reclamation Facility
5150 E. Lohman Ave., Las Cruces, NM

Take Exit 3, from I-25 South, E. Lohman Avenue approximately 1.9 mi.
DONA ANA COUNTY

Entry Time /Date
8:05 am/2-14-19

Exit Time/Date
10:00 am/2-14-19

Permit Effective Date
NOVEMBER 1, 2013

Permit Expiration Date
OCTOBER 31, 2018

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Jerry Flores/ WWTP Operator/575.528.3964
Lorenzo Martinez/ Plant Manager/575-528-3599
Joshua Rosenblatt/ Regulatory & Environmental Analyst/ 575-528-3704

Name, Address of Responsible Official/Title/Phone and Fax Number

Dr. Jorge A. Garcia, Utilities Director / (575) 528-3502 / (575) 528-3511
680 Motel Blvd Las Cruces, NM 88005

Contacted: Yes [ ] No [x]

Other Facility Data

OUTFALL 001

Latitude: N 32° 19' 48.8"
Longitude: W 106° 42' 46.4"

SIC 4952

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	S	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attached sheets for further details.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Jennifer Foote */s/ Jennifer Foote*	**NMED/SWQB 505-827-0596**	**3/19/19**
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Sarah Holcomb, Program Manager */s/ Sarah Holcomb*	**NMED/SWQB 505-827-2798**	**3/20/19**

East Mesa Water Reclamation Facility	PERMIT NO. NM0030872

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED No*)
DETAILS: New permit effective April 1, 2019

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	☒ Y ☐ N ☐ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	☐ Y ☐ N ☒ NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	☒ Y ☐ N ☐ NA
4. ALL DISCHARGES ARE PERMITTED	☒ Y ☐ N ☐ NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED Yes*)
DETAILS:.

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	☒ Y ☐ N ☐ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	☒ S ☐ M ☐ U ☐ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	☒ Y ☐ N ☐ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	☒ Y ☐ N ☐ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	☒ Y ☐ N ☐ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	☒ Y ☐ N ☐ NA
e) DATES AND TIMES OF ANALYSES.	☐ Y ☒ N ☐ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	☒ Y ☐ N ☐ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE. Thermometer at effluent sampler was calibrated 2017	☐ S ☒ M ☐ U ☐ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR	☒ S ☐ M ☐ U ☐ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	☒ Y ☐ N ☐ NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED No*)
DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.	☒ S ☐ M ☐ U ☐ NA
2. TREATMENT UNITS PROPERLY MAINTAINED.	☒ S ☐ M ☐ U ☐ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.	☒ S ☐ M ☐ U ☐ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☒ S ☐ M ☐ U ☐ NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE.	☒ S ☐ M ☐ U ☐ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	☒ S ☐ M ☐ U ☐ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	☒ S ☐ M ☐ U ☐ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	☒ Y ☐ N ☐ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	☒ Y ☐ N ☐ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	☒ Y ☐ N ☐ NA

East Mesa Water Reclamation Facility	PERMIT NO. NM0030872

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?	☐ Y ☒ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?	☐ Y ☐ N ☒ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	☐ Y ☐ N ☒ NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?	☐ Y ☒ N ☐ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	☐ Y ☐ N ☒ NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED No).*
DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☒ Y ☐ N ☐ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	☒ Y ☐ N ☐ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	☒ Y ☐ N ☐ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	☒ Y ☐ N ☐ NA
b) PROPER PRESERVATION TECHNIQUES USED.	☒ Y ☐ N ☐ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	☒ Y ☐ N ☐ NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	☐ Y ☐ N ☒ NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED No)*
DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE ultrasonic meter	☒ Y ☐ N ☐ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	☒ Y ☐ N ☐ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	☒ Y ☐ N ☐ NA
4. CALIBRATION FREQUENCY ADEQUATE. *(DATE OF LAST CALIBRATION* 12/14/18)	☒ Y ☐ N ☐ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	☒ Y ☐ N ☐ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	☒ Y ☐ N ☐ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. *No flow at time of inspection*	☐ Y ☐ N ☒ NA
6. HEAD MEASURED AT PROPER LOCATION.	☒ Y ☐ N ☐ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	☒ Y ☐ N ☐ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED)*
DETAILS: pH performed at facility

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)*	☒ Y ☐ N ☐ NA

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☒ S ☐ M ☐ U ☐ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. ☒ S ☐ M ☐ U ☐ NA

5. DUPLICATE SAMPLES ARE ANALYZED. 10 % OF THE TIME. ☒ Y ☐ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. Once/yr % OF THE TIME. ☒ Y ☐ N ☐ NA

7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NA
WET
BIO-AQUATICS
2501 MAYES RD #100; CARROLLTON, TX 75006

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED No).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	none	none	none	none	none	none	none

RECEIVING WATER OBSERVATIONS
Photo 2. Facility is preparing a TRE Action Plan.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED NO).*
DETAILS: Sent to Jacob Hands WWTP

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☒ S ☐ M ☐ U ☐ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☒ S ☐ M ☐ U ☐ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: N/A (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED).*

1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☐ N ☒ NA

2. TYPE OF SAMPLE OBTAINED

GRAB _____ COMPOSITE SAMPLE ___ METHOD _____ FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ☒ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☒ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☒ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☒ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☒ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☒ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☒ NA

Further Explanations
City of Las Cruces, East Mesa Water Reclamation Facility
Compliance Evaluation Inspection
NPDES Permit No. NM0030872
Inspection Date: February 14, 2019

INTRODUCTION:
On February 14, 2019, Jennifer Foote of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection at the City of Las Cruces, East Mesa Water Reclamation Facility in Doña Ana County, Las Cruces, New Mexico. The facility has a design flow capacity of 1.0 MGD (Million Gallons per Day) and is classified as a major municipal discharger under the federal Clean Water Act (CWA), Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0030872 which regulates discharge of treated sanitary wastewater from Outfall 001 to the Southfork Arroyo, thence to the Alameda Arroyo, thence to the Las Cruces Lateral, thence to the Rio Grande in Segment 20.6.4.101 (*State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC))* of the Rio Grande Basin.

The NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the Federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspector, and records and reports kept by the permittee and/or NMED.

INSPECTION DETAILS:
Upon arrival at the WWTP at 0800 hours on the day of this inspection, the inspector made introductions, presented her credentials, and explained the purpose of the inspection to Mr. Jerry Flores, the WWTP operator. The majority of documents are kept at Jacob Hands WWTP and documents were requested to be emailed to the inspector. The inspector and Mr. Flores toured the facility and were joined by Mr. Lorenzo Martinez, Plant Manager and Mr. Joshua Rosenblatt, Regulatory & Environmental Analyst. At the end of the tour, the inspector conducted an exit interview to discuss preliminary findings of the inspection. The meeting concluded at approximately 1000 hours.

TREATMENT SCHEME:
The collection system allows domestic wastewater from the east mesa side of Las Cruces, including the Mountain View Regional Medical Center, to be directed to the East Mesa Water Reclamation Facility. The collection system also allows for influent to be redirected to the Jacob Hands WWTP in an emergency situation.

Influent enters the facility to be treated by a mechanical drum screen and a spray wash. Screenings are collected and bagged at a compactor station for disposal. The plant has two identical treatment trains (east and west). Influent enters a selector tank followed by two first stage aeration tanks. A "blockout" in the aerator tank can be operated to allow wastewater to flow to the second stage aeration tank. Solids from the first stage of aeration tank can be sent to a digester tank (two digester tanks available). Wastewater then flows through an inlet screen to a rectangular clarifier basin. Return Activated Sludge (RAS) is sent through a trough and gravity fed back into the aeration basin. Following clarification, flow is sent to disc filter drums. The backwash from the disc filter drums is pumped back to the headworks. After the filter drums, flow enters the ultra-violet unit for disinfection.

After disinfection, effluent is metered prior to discharge at Outfall 001. According to the permit application, this facility has a limited discharge of approximately 0.09 MGD during the months of November through February. The City of Las Cruces has a State of New Mexico Ground Water Discharge Permit to use reclaimed water for irrigation at the Sonoma Golf Course along with other city owned properties.

Sludge
Biosolids are transported to the City of Las Cruces Jacob Hands WWTP via truck. The biosolids are combined with those generated at the Jacob Hands facility. Sludge is sent to the City of Las Cruces West Mesa Compost facility for further treatment.

Section B - Recordkeeping and Reporting Evaluation - Overall Rating of "Satisfactory"
Permit Requirements: Part III.C.4 (Standard Conditions, Record Contents) of the permit states:

> *Records of monitoring information shall include:*
> *a. The date, exact place, and time of sampling or measurements;*
> *b. The individual(s) who performed the sampling or measurements;*
> *c. The date(s) and time(s) analyses were performed;*
> *d. The individual(s) who performed the analyses;*
> *e. The analytical techniques or methods used; and*
> *f. The results of such analyses.*

Findings for Recordkeeping and Reporting Evaluation:

- The bench sheet for pH does not identify the method being used for analysis or the time of sampling to verify the holding time is being met for this parameter.
- Facility should consider using a NODI code when reporting to indicate that TRC is not performed that month rather than a measured zero.

NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Google earth	Date: 5/30/2018	Time: N/A
City/County: Las Cruces/ Dona Ana County		State: New Mexico
Location: East Mesa Water Reclamation Facility		
Subject: Aerial photo		

NMED/SWQB Official Photograph Log Photo # 2		
Photographer: Jennifer Foote	Date: 2/14/19	Time: 9:45am
City/County: Las Cruces/ Dona Ana County		State: New Mexico
Location: East Mesa Water Reclamation Facility		
Subject: Effluent at discharge point		

NMED/SWQB Official Photograph Log Photo # 3		
Photographer: Jennifer Foote	Date: 2/14/19	Time: 9:10am
City/County: Las Cruces/ Dona Ana County		State: New Mexico
Location: East Mesa Water Reclamation Facility		
Subject: pumping sludge with spill container at fill port